SEP 17 ZUU4

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF RHODE ISLAND

by and a		 See See	C 12. S	
DISTRICT	OI		Array A	أسفات الله

ALBERT	L. (GRAY,	Administrator,	et al.

Plaintiffs.

C.A. No. 04-312L

JEFFREY DERDERIAN, et al.

٧.

Defendants

MOTION FOR ENTRY OF APPEARANCE

PRO HAC VICE

Plaintiff/defendant JBL, Inc. f/k/a James B. Lansing Sound, Inc. d/b/a JBL Professional hereby moves that Georgia A. Sullivan, Esq. be admitted *pro hac vice* in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

□ The case involves the following complex area of the law, in which pro hac vice counsel specializes:

specializ	es	•
[Pro hac vice counsel's long-standing representation of the client(s):
ŀ		The local trial bar lacks experience in the field of:
[The case involves complex legal questions under the law of a foreign jurisdiction with
which pr	o t	nac vice counsel is familiar, specifically:
[The case requires extensive discovery in a foreign jurisdiction convenient to pro hac
vice cou	nse	el, as follows:
[It is a criminal case, and pro hac vice counsel is defendant's counsel of choice.

X Other: We have been retained as staff counsel by the Hartford Insurance Company to represent the defendant and to assist local counsel in the defense of this matter based upon the anticipated large number of parties and magnitude of discovery.



I certify that I have read and join in the foregoing motion, and acknowledge and agree to observe the requirements of Local Rule 5 in its entirety and as it relates to the participation and responsibilities of local associate counsel.

responsibilities of local associate counsel. eorgia A. Sullivan (#408856) Local Associate Counsel) C. Russell Bengtson 1233 R.I. Bar ID# Mathis & Associates Carroll, Kelly & Murphy Firm Name: Firm Name: 55 Farmington Ave. ,Suite 500 One Turks Head Place, Suite 400, Hartford, CT 06105 Providence, RI 02903 **Business Address: Business Address:** (860) 520-1650 (860) 520-2287 (401) 331-7272 (401) 331-4404 Tel# Fax# Tel#

ORDER:

This motion is hereby <u>CRANTED</u>

Sh. U.S. District Judge

Date: 10/12/04